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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

MARTIN DULBERG, individually, and on  
behalf of all others similarly situated,

Plaintiff,

v.

UBER TECHNOLOGIES, INC., and  
RASIER, LLC,

Defendants.

Case No. 3:17-CV-00850-WHA

**JOINT STIPULATION UNDER LOCAL  
RULE 6-2(a) REQUESTING CHANGE  
OF HEARING DATE AND STAY OF  
NON-SETTLEMENT-RELATED  
PROCEEDINGS; [PROPOSED] ORDER**

**JOINT STIPULATION**

Plaintiff and Class Representative Martin Dulberg (“Plaintiff”) and Defendants Uber Technologies, Inc. and Rasier LLC (collectively, “Uber,” and together with Plaintiff, the “Parties”), hereby stipulate and agree that:

WHEREAS, on February 21, 2017, Plaintiff filed a Class Action Complaint against Uber;

WHEREAS, on July 27, 2017, the Court entered the Case Management Order (ECF No. 50, the “Order”) setting the deadlines in this case;

WHEREAS, pursuant to the Order, the final pretrial conference is set for October 17, 2018, with trial beginning on October 29 (Order ¶¶ 11, 12);

WHEREAS, on May 18, 2018, the Parties filed a Joint Notice of Settlement and Stipulated Request for Administrative Relief (ECF No. 93), notifying the Court that the Parties reached an agreement in principle for a class-wide settlement;

WHEREAS, to give the Parties time to complete the settlement agreement and Plaintiff time to submit the motion for preliminary approval, the Parties filed a joint stipulation on June 28, 2018, requesting a short extension of the deadline for dispositive motions, which the Court granted on July 2;

WHEREAS, to give the Parties time to complete the settlement agreement and Plaintiff time to submit the motion for preliminary approval, the Parties filed another joint stipulation on July 25, 2018, requesting a short extension of the deadline for dispositive motions, which the Court granted on July 26;

WHEREAS, on August 27, 2018, Plaintiff filed the motion for preliminary approval of the settlement agreement, which sets September 27 as the hearing date;

WHEREAS, the Parties request that the Court move the hearing to October 11 (or any subsequent date) because Plaintiff’s counsel has a scheduling conflict on September 27;

WHEREAS, to allow the Parties adequate time to progress through the settlement process without expending resources preparing for trial, the Parties request that the Court stay all non-settlement-related proceedings in this action and vacate the currently scheduled final pretrial conference and jury trial;

1 NOW, THEREFORE, pursuant to Rule 6-2(a) of the Local Civil Rules of the United  
2 States District Court for the Northern District of California, the Parties hereby STIPULATE and  
3 REQUEST that the hearing date on Plaintiff's motion for preliminary approval of the settlement  
4 agreement be moved from September 27 to October 11 (or any subsequent date). The Parties  
5 further STIPULATE and REQUEST that all non-settlement-related proceedings in this action are  
6 stayed and that the currently scheduled final pretrial conference and jury trial are vacated.

7  
8 IT IS SO STIPULATED.

9  
10 Dated: September 13, 2018

O'MELVENY & MYERS LLP

11 By: /s/ Randall W. Edwards  
12 Randall W. Edwards

13 Attorneys for Defendants  
14 Uber Technologies, Inc. and Rasier, LLC

15 Dated: September 13, 2018

NAPOLI SHKOLNIK PLLC

16 By: /s/ Paul B. Maslo  
17 Paul B. Maslo

18 Attorneys for Plaintiff

19 **ATTESTATION OF FILING**

20 Pursuant to Local Rule 5.1(i)(3) regarding signatures, I, Paul B. Maslo, attest that Randall  
21 W. Edwards concurs in the filing of this joint stipulation.  
22

23 Dated: September 13, 2018

NAPOLI SHKOLNIK PLLC

24 By: /s/ Paul B. Maslo  
25 Paul B. Maslo  
26  
27  
28

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_

By: \_\_\_\_\_  
Hon. William H. Alsup  
United States District Judge